

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

In re:		Chapter 11
SOUTHCROSS HOLDINGS LP, et al,		Case No. 16-20111
Debtors		Jointly Administered

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**OBJECTION OF CATERPILLAR FINANCIAL SERVICES CORPORATION  
TO THE DEBTORS' MOTION FOR INTERIM AND FINAL ORDERS (I)  
AUTHORIZING THE DEBTORS TO OBTAIN POSTPETITION SECURED  
FINANCING, (II) GRANTING LIENS AND PROVIDING SUPERPRIORITY  
ADMINISTRATIVE EXPENSE CLAIMS, (III) AUTHORIZING THE USE OF CASH  
COLLATRAL, (IV) GRANTING ADEQUATE PROTECTION, (V) MODIFYING  
THE AUTOMATIC STAY, (VI) SCHEDULING A FINAL HEARING, AND  
(VII) GRANTING RELATED RELIEF  
(doc 9)**

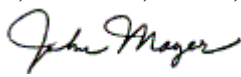
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Comes now Caterpillar Financial Services Corporation (“Caterpillar Financial”) a creditor and party in interest and objects to the Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Secured Financing, (II) Granting Liens and Providing Superpriority Administrative Expense Claims, (III) Authorizing the Use of Cash Collateral, (IV) Granting Adequate Protection, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief (doc 9, the “Motion”), and respectfully represents:

1. The Motion would authorize the Debtors to disburse most if not all of the Debtors’ income to the Debtors’ non bankrupt subsidiaries, who would be able to spend the Debtors’ money as they see fit, without supervision or control of the Bankruptcy Court or the normal budget approval process, to the detriment of the estate.

Respectfully submitted,

ROSS, BANKS, MAY, CRON & CAVIN, P.C.

By: 

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Attorney for Caterpillar Financial  
Services Corporation

**CERTIFICATE OF SERVICE**

I certify that true copies of this objection were served upon all persons and parties who have entered an appearance in this case electronically by means of the Court's CM/ECF system on March 30, 2016.



John Mayer